

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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JENNIFER S. FISCHMAN,

Plaintiff,

Index No. 18-cv-08188 (JMF)

v.

**NOTICE OF DEFENDANTS’
MOTION FOR SANCTIONS**

MITSUBISHI CHEMICAL HOLDINGS
AMERICA, INC.; MITSUBISHI CHEMICAL
CORPORATION; MITSUBISHI CHEMICAL
HOLDINGS CORPORATION; NICHOLAS
OLIVA, in his individual and professional
capacities; DONNA COSTA, in her individual
and professional capacities; and JOHN DOES
1-10, in their individual and professional
Capacities,

Defendants.

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PLEASE TAKE NOTICE that, upon the annexed Declaration of Mercedes Colwin, dated October 22, 2021, the exhibits annexed thereto, the Memorandum of Law in Support of Defendants’ Motion for Sanctions, dated October 22, 2021, and upon all prior pleadings and proceedings herein, Defendants Mitsubishi Chemical Holdings America, Inc., Donna Costa, and Nicholas Oliva, by their attorneys Gordon Rees Scully Mansukhani, LLP, and Defendant Mitsubishi Chemical Holdings Corporation, by its attorneys Shearman & Sterling LLP, will move this court, before the Honorable Jesse M. Furman, United States District Judge for the Southern District of New York, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007, on a date and at a time to be designated by the Court, for an order granting Defendants’ Motion for Sanctions, dismissing Plaintiff’s lawsuit in its entirety, and awarding Defendants their costs, attorneys’ fees and disbursements, and such other and further relief as the Court deems just and proper.

Dated: New York, New York
October 22, 2021

Respectfully submitted,

GORDON, REES, SCULLY &
MANSUKHANI, LLP

By: /s/ Mercedes Colwin
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